

DATE

Mr. Jeffery J. Thomas
Partner, Equity Media
701 Poydras St., Suite 4350
2827 Annunciation St.
New Orleans, LA 70139

**Re: Docket No. 2022-012
Advisory Opinion**

Dear Mr. Thomas:

The Louisiana Board of Ethics, at its March 4, 2022 meeting, considered your request for an advisory opinion as to whether Oliver Thomas could be hired as a radio host while he serves on the New Orleans City Council.

FACTS PROVIDED

You stated that you are a partner in Equity Media, a company that owns and operates WBOK 1230 am radio. WBOK is a talk show format station that discusses a wide array of issues relevant to the nation, the State of Louisiana, and New Orleans, including local politics. You stated that Oliver Thomas was a radio talk show host who took a leave of absence to run for elected office. Mr. Thomas was elected to the New Orleans City Council and would like to return to work as a radio talk show host. You further stated that WBOK has advertisers who also do business with the City of New Orleans.

According to a news article in The Times-Picayune/The New Orleans Advocate, neither City Hall, nor any other topics will be off limits should Mr. Thomas “get back behind the mic.”

Oliver Thomas returned to work at WBOK on February 1, 2022 as a talk radio host.

LAW

La. R.S. 42:1111C(1)(a) prohibits a public servant from receiving any thing of economic value for any service, the subject matter of which is devoted substantially to the responsibilities,

programs, or operations of the agency of the public servant and in which the public servant has participated.

La. R.S. 42:1102. Definitions

(2)(a) “**Agency**” means a department, office, division, agency, commission, board, committee, or other organizational unit of a governmental entity. For purposes of this Chapter, “agency of the public servant” and “his agency” when used in reference to the agency of a public servant shall mean:

(vi) For public servants of political subdivisions, it shall mean the agency in which the public servant serves, except that for members of any governing authority and for the elected or appointed chief executive of a governmental entity, it shall mean the governmental entity. Public servants of political subdivisions shall include, but shall not be limited to, elected officials and public employees of municipalities, parishes, and other political subdivisions.

CONCLUSION

The Board concluded, and instructed me to inform you, that because the facts on which this opinion request is based involve past conduct, the Board has declined to render an opinion.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Code of Governmental Ethics. The Board issues no opinion as to past conduct and or to laws other than the Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Acts, and the conflict of interest provisions contained in the Louisiana Gaming Control Law.

If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

LOUISIANA BOARD OF ETHICS

Gregory L. Thibodeaux
For the Board